

Exhibit A

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CONSERVATION LAW FOUNDATION,
INC.
and
CHARLES RIVER WATERSHED
ASSOCIATION, INC.

Plaintiffs,

v.

Case No. 22-11863

Michael S. REGAN, in his official capacity as
Administrator of the
U.S. Environmental Protection Agency,
David CASH, in his official capacity as
Regional Administrator for Region I of the
U.S. Environmental Protection Agency,
and
U.S. ENVIRONMENTAL PROTECTION
AGENCY,

Defendants.

DECLARATION OF HEATHER A. GOVERN

Pursuant to 28 U.S.C. § 1746, I, Heather A. Govern, declare as follows:

1. I am a Vice President and the director of Conservation Law Foundation, Inc.'s ("CLF") Clean Air and Water Program. I am one of the attorneys representing Plaintiffs in this matter.
2. I have personal knowledge of the facts stated herein based either on my own experience or my consultation with others; the facts are known to me in my capacity as counsel for Plaintiffs and each of them is true and correct.
3. I submit this declaration in support of Plaintiffs' Assented-to Motion for Extension of Time to Effect Service.

4. The Parties have exchanged information and have met multiple times in December 2022 to discuss a potential out-of-court resolution.
5. On December 15, 2022, Plaintiffs sent Defendants a settlement offer.
6. Plaintiffs anticipate receiving Defendants' response between February 2023 and March 2023.
7. An extension of time to effect service will allow for further discussions to resolve the underlying issues in the action without expending judicial resources.
8. On November 2, 2022, Plaintiffs filed their complaint in this case. ECF No. 1. Accordingly, the deadline for Plaintiffs to serve Defendants is January 31, 2023.
9. A 45-day extension of the time to effect service would extend the deadline from January 31, 2023 to March 17, 2023.
10. I believe that discussing an out-of-court resolution to resolve Plaintiffs' claims against Defendants in this action constitutes good cause under Local Rule 4.1(b) and Fed. R. Civ. P 6(b) for the requested extension of time.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 26, 2023

Respectfully submitted,

/s/ Heather A. Govern
Heather A. Govern

CERTIFICATE OF SERVICE

I hereby certify that on January 26, 2023, the foregoing document was filed through the ECF system, by which means a copy of the filing will be sent electronically to all Parties registered with the ECF system, and sent to Defendants' counsel by email.

/s/ Heather A. Govern
Heather A. Govern